

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. ) No. 4:24 MJ 3020 NCC  
 )  
 TALITO AMOS, )  
 )  
 Defendant.

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is currently charged with Distribution of Controlled Substances, in violation of 21 U.S.C. § 841(a), an offense for which a maximum 20 years imprisonment is prescribed under Title 21. Therefore, a rebuttal presumption in favor of detention exists.
2. According to the Bureau of Alcohol, Tobacco, Firearms and Explosives, the Defendant is part of a drug-trafficking organization (“DTO”) that sells fentanyl and methamphetamine throughout the St. Louis area. In October of 2023, St. Louis Metropolitan Police Department (“SLMPD”) officers were investigating the DTO, which used a particular phone number for drug users to call to arrange drug transactions. As part of their investigation, SLMPD officers executed a search warrant and seized \$1,937, 259 capsules of fentanyl, and approximately 96 grams of methamphetamine. Thereafter, an ATF agent, acting undercover, began contacting the DTO

cellular phone to arrange narcotics transactions. Between November 2, 2023 and January 11, 2024, the DTO sold ATF 397 capsules of fentanyl and approximately 217 grams of methamphetamine. The Defendant was directly involved in several of these transactions.

3. On January 23, 2024, ATF purchased approximately 300 capsules of suspected fentanyl directly from the Defendant. The Defendant also offered to sell the ATF agent a pound of methamphetamine. Thereafter, a federal search warrant was executed at the Defendant's mother's house, where the Defendant and others in the DTO appear to store and package controlled substances. Located inside the residence was a Draco, AK-style firearm, two large bags of capsules containing suspected fentanyl, suspected methamphetamine, thousands of empty capsules, a pill press, and grinders. The Defendant admitted possession of the firearm and some of the suspected controlled substances.

4. While the Defendant does not have any criminal convictions, he has multiple pending municipal charges and he has active warrants for failing to appear for court dates for some of those cases.

5. The Defendant's history of failing to appear to court, coupled with the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the Defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

SAYLER A. FLEMING  
United States Attorney

*s/Jennifer Szczucinski*  
JENNIFER SZCZUCINSKI  
Assistant United States Attorney